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September 19, 1991

Mr. Frazer Lockhart
U. S. Department of Energy
Rocky Flats Office
P.O. Box 928
Golden, Colorado 80402-0928



RE: Phase I and Phase II RFI/RI Workplans and Investigations

Dear Mr. Lockhart,

The Colorado Department of Health, Hazardous Materials and Waste Management Division (the Division), and the Environmental Protection Agency (EPA) would like to clarify our position on multiple RFI/RI investigation phases, particularly as they apply to OUs 3, 5, 6, 8, 12, 13, 14, 15, and 16. This discussion will not apply to other OUs as they are interim status closure units specifically targeted for two investigatory phases.

Within the IAG, discussions concerning RFI/RI workplans, investigations, and reports appear in sections I, VI, and VII. These sections discuss the phased approach to RFI/RI investigations to be used at Rocky Flats. The State and EPA believe that DOE's interpretation of RFI/RI phases relies heavily on section I.B.9 and does not consider the complete intent of sections VI and VII. However, the regulatory agencies will be reviewing the Phase I RFI/RI workplans based upon their ability to fulfill the requirements as set forth in all of the IAG sections listed above.

It is the regulatory agencies' position that Phase I RFI/RI workplans and investigations would be as comprehensive as possible based on existing knowledge of sites and the best investigative techniques. This is the reason, we believe, that language requiring specific documentation within the Phase I RFI/RI reports of the nature and extent, as well as the fate and transport, of contamination is included in sections VI and VII of the IAG. Phase II RFI/RI investigations should only be necessary to address data gaps or unexpected situations that may arise during the Phase I investigation. The objective should be to complete the RFI/RI in one phase, not to conduct a narrow Phase I under the presumption that a Phase II will be required.

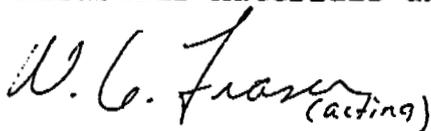
We recognize that the complexities within some OUs make the design of a comprehensive Phase I investigation difficult. However, we feel that a staged approach within Phase I could alleviate the contingent relationship certain tasks have to others within the characterization process. This staged approach will allow much more characterization work to be compressed into a single RFI/RI phase and will result in significant time and resource savings. The State and EPA believe that constructing comprehensive Phase I RFI/RI workplans may make it unnecessary to do extensive Phase II investigations on most of the OUs at Rocky Flats.

If you have any questions regarding these matters, please call Joe Schieffelin (CDH) at 331-4421 or Bill Fraser (EPA) at 294-1081.

Sincerely,



Gary W. Baughman
Unit Leader, Hazardous Waste Facilities
Hazardous Materials and Waste Management Division, CDH



Martin Hestmark
Manager, Rocky Flats Project, EPA

cc: Daniel S. Miller, AGO
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